

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., and
CHRISTOPHER MILLS, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

vs.

LG ELECTRONICS, INC., LG
ELECTRONICS U.S.A., INC.,
SAMSUNG ELECTRONICS CO. LTD.,
SAMSUNG ELECTRONICS
AMERICA, INC., SONY
CORPORATION and SONY
ELECTRONICS INC., and JOHN and
JANE DOES (1-Unlimited) and ABC
Corporations (1-Unlimited),
Defendants.

Civil Action No. 17- 1775
(MCA)(SCM)

Hon. Madeline Cox Arleo, U.S.D.J.
Hon. Steven C. Mannion, U.S.M.J.

**JOINT STIPULATION AND
[PROPOSED] CONSENT ORDER**

WHEREAS, the above-named Plaintiffs instituted this action on March 16, 2017 against the above-named Defendants, **[DE #1]** (the “Initial Complaint”); and

WHEREAS, Plaintiffs did not serve the Initial Complaint on LG Electronics, Inc., Samsung Electronics Co., Ltd., and Sony Corporation (collectively the “Foreign Parent Companies”);

WHEREAS, Plaintiffs filed an amended complaint on January 17, 2018 against the above-named Defendants, **[DE #45]** (the “Amended Complaint”); and

WHEREAS, Plaintiffs did not serve the Amended Complaint on the Foreign Parent Companies; and

WHEREAS, without requiring any agreement to any preconditions, Plaintiffs consent to dismissing the Foreign Parent Companies and having the names of the Foreign Parent Companies struck from the caption; and

WHEREAS, Plaintiffs have consistently stated that they are “respectfully willing to accept any discovery parameters that the Court believes best serve the interests of this case and the Court”, *see, e.g.*, [DE #61], p.5; and

WHEREAS, Defendants LG Electronics U.S.A., Inc., Samsung Electronics America, Inc., and Sony Electronics Inc. (collectively, “Defendants”) moved for an Order staying discovery [D.E. #67] pending the outcome of Defendants’ motion to dismiss [D.E. #54]; and

WHEREAS, on due consideration, Plaintiffs agree with Defendants and Plaintiffs thus do not oppose Defendants’ motion for an Order staying discovery pending determination of the contested motion to dismiss;

IT IS, on this _____ day of _____ 2018,

ORDERED that LG Electronics, Inc., Samsung Electronics Co., Ltd., and Sony Corporation are dismissed and their names struck from the caption;

ORDERED that Defendants’ motion to stay discovery is GRANTED; and it is further

ORDERED that all discovery in this matter shall be stayed pending further order of the Court after a decision ruling on Defendants’ motion to dismiss.

[SIGNATURE PAGES FOLLOW]

STIPULATED AND AGREED TO:

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APPROVED AND SO ORDERED:

HON. STEVEN C. MANNION, U.S.M.J.

DATE